

# Equality Impact Assessment Tool - Introduction

This Equality Impact Assessment tool aims to help you to consider and record how equality issues relate to your policies, projects, services, strategies or functions. It is easy to complete and will help you to understand which communities of identity will be affected by your proposals and how. The tool will help you to:

1. Assess whether a policy, project, service redesign or strategy is relevant to our equality duties and / or different groups in Manchester
2. Identify what the potential impacts of the activity will be for different communities
3. Highlight what actions could be taken to mitigate any negative impacts that you identify

The Equality, Diversity and Inclusion Team give equality advice, guidance and support to all Council Teams, you can reach us at:

[Equalitiesteam@manchester.gov.uk](mailto:Equalitiesteam@manchester.gov.uk)

## Guidance for officers

### Roles and responsibilities

- The service managing the activity is responsible for completing an Equality Impact Assessment (EqIA) on it and should start this at the earliest opportunity
- The Equality, Diversity and Inclusion Team (EDI Team) is responsible for help, support and guidance throughout the process of completing EqIAs and provide quality assurance on final draft versions prior to submission to your Head of Service.
- The Head of Service is responsible for approving the EqIA
- The Strategic Director is ultimately responsible for the EqIAs completed in their service area as these documents are completed in line with our statutory responsibilities

### Gathering your evidence

When developing your policy, strategy or project, consider which vulnerable or disadvantaged groups might be the most affected. These will include the groups protected by the Equality Act 2010 but may also include other vulnerable groups in society. Have a think about impact on:

- People in different age groups, like older people, young people and children
- People with continuing health conditions
- Disabled people (including consideration of mental health issues)
- People with caring responsibilities
- People of various faiths, religions and beliefs
- Trans people, non-binary people and other consideration of gender reassignment
- Married people and people in a civil partnership
- Homeless people
- Ex-Armed Forces personnel and their families
- People of either sex, with consideration of women during periods of pregnancy and maternity
- Different racial groups
- Lesbian, gay and bisexual people and other consideration of sexual orientation
- Children, families and other people living in poverty

When you're gathering evidence for your equality analysis, think about:

- What relevant service-level information is available and where can I get it from?
- Is there evidence from other sources that I could use, like websites, research reports, Census data or advice from independent commissions (i.e. Equality and Human Right Commission)?
- Has there been any engagement with stakeholders that I can draw evidence from, or might I need to do this?

### Completing the tool

The tool has tips to help you as you fill it in, but a few things to remember are:

- Your assessment should be objective and based of evidence, not opinion.
  - Make your points clearly and concisely; don't copy and paste whole sections of other reports into this tool.
  - Signpost to other sources of information if they're relevant.
  - Use plain English and avoid abbreviations, jargon or technical terms.
  - Clearly show the link between your findings and the evidence that supports them.
  - Highlight whether the impacts that you identify are positive or adverse. If adverse, indicate whether the proposal can be adjusted to prevent the impact. Seek support from the Head of Service to assess what adjustments could be considered.
  - If there is a justifiable reason why the proposal can't be adjusted, clearly outline why and what the implications of this would be. This will help decision-makers reach well informed conclusions.
  - Any actions you identify to adjust the option should be captured in the actions log at Annex 1.
  - Remember that impacts can be on all groups, some or one. An adverse impact on one characteristic is no less significant than impacts for all groups.
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# Equality Impact Assessment

## 1. Tell us about your service

My Directorate	Neighbourhoods
My Service	Homelessness
My team / section	Commissioning
The name of the function being analysed	Homelessness Commissioning Strategy
Who is completing the assessment?	Anna Thorogood
Who is the lead manager for the assessment?	Jane Davies

## 2. Tell us about the activity that you're analysing

Briefly describe the main aims and objectives of your policy, project, service redesign or strategy, including outlining at a high level if it has implications for other areas of the Council's work and priorities.

The Homelessness Strategy, Policy, and Commissioning service has a broad remit of commissioning work, including both mainstream services and government funded projects and pilots:

### Homelessness and Rough Sleeping

- Housing Related Support Pathways: Supported Accommodation and Resettlement/Floating Support
- Homelessness Prevention Grant funded Services and other grant funded services
- A Bed Every Night (ABEN)
- CAS-3
- RSI

- RSAP
- Young Persons Homelessness Prevention & Relief Service (18-25 years)
- Cold Weather Provision
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#### Advice Services

- City-Wide Advice Service (Citizens Advice Manchester; Shelter, Cheetham Hill Advice Centre)
- Greater Manchester Immigration Aid Unit (GMIAU)

#### Domestic Violence and Abuse

- Refuges
- Outreach Services
- New Burdens Funded Services
- Respite Rooms
- Miscellaneous contracts and grants

The service has recently completed a draft of a new Homelessness Commissioning Strategy, which covers the services listed above. The strategy sets out the service's vision to prevent and end homelessness through commissioning a range of services that meet the needs of people and enable long term independence. Its aim is to improve outcomes for some of the city's most vulnerable residents, and proactively respond to how inequalities impact people's lives and commission services to reduce the inequalities gap. The strategy's approach to commissioning is outcome focused and evidence-based, underpinned by a strong commitment to partnership and collaborative working.

The Strategy has four key objectives

1. Commission services that prevent and end homelessness and deliver better outcomes and better lives for people using them.
2. Increase and reshape the supply of supported housing and other homeless accommodation in Manchester to meet demand and need.
3. Improve move on from temporary and supported housing into independent accommodation that can be sustained.
4. Improve commissioning processes and continue to work collaboratively with partners and across services and embed the principles of co-production in commissioning practice.

The Strategy is closely linked to a number of wider Council work areas and policies. It will both complement and support the the **Enabling Independence Accommodation Strategy**, with a shared vision and common objectives. It also supports the aspirations of the Homelessness Strategy for the City:

- Making homelessness a rare occurrence: increasing prevention and earlier intervention at a neighbourhood level
- Making homelessness as brief as possible: improving temporary and supported accommodation to be a positive experience
- Making the experience of homelessness to be a one-off occurrence: increasing access to settled homes

The Homelessness Commissioning Strategy also reflects and contributes to a range of wider strategies and programmes, including, but not limited to:

- Greater Manchester Homelessness Prevention Strategy
- Central Government's Rough Sleeping Strategy
- The Our Manchester Strategy 2016–2025
- Building Back Fairer Programme
- Manchester's Housing Strategy 2022 -2032
- Bringing Services Together for People and Places
- Housing Allocation Policy
- Anti-Poverty Strategy

**TIP:** briefly summarise the key points and keep your answer under 500 words.

**TIP:** try not to duplicate information that's available elsewhere; you can easily use this space to signpost to other sources of background information instead of rewriting them here.

### 3. Analysing the impact on equality

Will the policy, strategy, project, service redesign being assessed here... (Tick all that apply):

Remove or minimise disadvantages suffered by individuals or groups because of their characteristics	x
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Meet the needs of people from protected or disadvantaged groups where these are different from the needs of other people	x
Promote diversity and encourage people from protected or disadvantaged groups to participate in activities where they are underrepresented	x

Describe how you've reached your conclusion and what evidence it's based on (500 words max).

Tackling inequalities has underpinned the development of the new Commissioning Strategy and is a fundamental part of both its objectives, and the work plan that flows from these. This is because, the evidence shows that homelessness is multi-faceted; differing among different groups and requiring different responses. Key data drawn from nationwide research shows:

- 13% of rough sleepers captured in the 2021 rough sleeping snapshot were female (12% in Manchester). <https://www.statista.com/statistics/382196/rough-sleepers-england-by-gender/#:~:text=In%202021%20there%20were%20reported,in%20England%20have%20been%20males.>
- 54% of females supported by the homeless charity St Mungo's had experienced violence or abuse from a partner or family member. <https://www.mungos.org/ending-homelessness-fund-domestic-abuse-services/>
- Up to 25% of looked after children and care leavers find themselves homeless once they are no longer covered by child services, with 14% sleeping rough. <https://www.stepbystep.org.uk/news/care-leavers-and-homelessness/>
- Black people are disproportionately affected by homelessness with 1 in 23 black households becoming homeless or threatened with homelessness, versus 1 in 83 households from all other ethnicities combined. In Manchester, whilst the Census 2021 identifies 8.6% of people living in the city as black, this groups accounts for 19% of homelessness assessments. [https://england.shelter.org.uk/media/press\\_release/black\\_people\\_are\\_more\\_than\\_three\\_times\\_as\\_likely\\_to\\_experience\\_homelessness](https://england.shelter.org.uk/media/press_release/black_people_are_more_than_three_times_as_likely_to_experience_homelessness)
- Crisis identified that 58% of females sleeping rough nationally have been intimidated or threatened and that, over the course of a year, one in four were sexually assaulted. [https://www.crisis.org.uk/media/20502/crisis\\_its\\_no\\_life\\_at\\_all2016.pdf](https://www.crisis.org.uk/media/20502/crisis_its_no_life_at_all2016.pdf)
- Over half (59%) of LGBTQ+ young people have faced some form of discrimination or harassment while accessing homeless services. <https://www.akt.org.uk/report>

In addition, the report of the UN Special Rapporteur on the right to adequate housing, states that “homelessness disproportionately affects persons with disabilities. In a vicious circle, disability often leads to homelessness and homelessness, in turn, creates or exacerbates impairments and additional barriers”. <https://www.ohchr.org/en/publications/fact-sheets/fact-sheet-no-21-rev-1-human-right-adequate-housing>

Consequently, Commissioners sought to ensure that when developing the strategy, the differing causes and impacts of homelessness among different groups were central to its objectives, and not just part of an EqlA. This work included a comprehensive review of current equalities work and how this is embedded in commissioning processes. As a result, the objective of the strategy that focuses on improving commissioning processes and co-production provides a vehicle for developing a more robust approach to addressing inequalities across our broader commissioning activity, including work with our providers. Initial workstreams within this include:

- Monitoring equalities: Building on recent work to improve equalities monitoring through the MAS Gateway<sup>1</sup>, commissioners will develop consistent equalities monitoring and review processes as part of procurement and contract monitoring. This data will be used to inform ongoing service development as well as future commissioning options.
- Developing flexible procurement approaches, including ‘light-touch’ tenders to help develop and encourage smaller VCSE and ‘by and for’ groups to bid for contracts and grants.
- Evidence-Led Commissioning: Continuing to research into what works for different groups, utilising best practice from other areas and services
- Providers equality: Linked to monitoring equalities, this will look at ensuring that commissioned providers have robust equalities policies, including for recruitment and selection, and co-production with the people using their services.

Work delivered through this objective will aim to tackle inequalities across all areas but recognises that resource and financial limitations will make full equity of provision difficult to achieve.

In addition, research, service review, and co-production to develop the strategy has led to the inclusion of an objectives focused on commissioning services that prevent and end homelessness and deliver Better Outcomes and Better Lives for people using them. This objective provides a home for commissioning work focused on reviewing existing pathways and services and on exploring new models and approaches to delivering services. At the heart of this will be a focus on developing service models

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<sup>1</sup> The MAS Gateway is a cloud-based referral and service monitoring system for commissioned accommodation and floating support services.

that deliver the best possible outcomes for people, including the most vulnerable, and services that actively reduce the inequalities gap. Initial projects within this include:

- Women's Pathway
- Transgender Inclusion Policy
- Young People's Pathway Review
- Alternatives to Bed & Breakfast provision

Information on each of these projects is included in the table below, alongside the evidence gathered so far, and anticipated equalities impact. Commissioners recognise that the projects listed above are not comprehensive in tackling inequalities across the board, and that there are particular gaps with regard to race and disability. This is largely due to financial and resource limitations, with the initial projects either designed to deliver budget savings or receiving funding from designated central government funding streams tied to delivery to certain cohorts. Nevertheless, as work to deliver this objective progresses additional initiatives and interventions will be developed with the aim of tackling these inequalities, and the EqIA will be updated to reflect these as necessary.

Finally, a key element of the strategy is the service's approach to commissioning, which seeks to be collaborative and involve people with lived experience of homelessness as stakeholders in design and decision making. The strategy's commitment to co-production is as follows:

**Early involvement:** People are involved from the beginning of commissioning or design processes to ensure that they have the greatest opportunity to shape services and do not feel that proposals are a fait accompli.

**Meaningful input:** People have input into areas where meaningful change can be achieved rather than involved in co-production for the sake of co-production. Whilst this means that co-production isn't part of every service decision or commissioning exercise, it ensures that where co-production does take place it is authentic and meaningful.

**Ongoing involvement:** Where people are involved in co-designing services, there is a commitment to involving them in ongoing monitoring and evaluation. The emphasis here is on people feeling that they 'own' the service alongside commissioners and can continue to influence its development

**Provider co-production:** There is an expectation that commissioned providers will actively develop and embed co-production in their services. This is explicitly stated in all service specification and is part of the ongoing monitoring and evaluation of all commissioned services. This also includes commissioned providers supporting wider co-production through supporting people accessing their services to take part in co-production.

This commitment aims to promote diversity within the voices that shape commissioning design and decision making and alongside data and research, is a key element in ensuring that services meet differing needs.

Considering which group/s you have identified the policy, project, strategy or service redesign as being relevant to, complete the table below. Be brief with your answers and only complete them for the group/s relevant to your activity.

1. What is the impact of your proposal on this group?	2. What evidence have you used to reach this assessment?	3. What actions could be taken to address the impacts?
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<p>Age (older people)</p>	<p>Work to embed an equalities approach across commissioning will ensure that the needs of older people are proactively considered as part of commissioning decisions.</p>		<p>Monitoring of positive impacts will form part of contract monitoring, including health and wellbeing outcomes. Co-production with people using services will influence service design and delivery to ensure it meets needs.</p>
<p>Age (children and young people)</p>	<p>The review of the young persons pathway will help to minimise disadvantage for this group. It will improve outcomes by strengthening the approach to homelessness prevention and ensuring that, wherever possible, young people are provided with support and assistance so that they do not become homeless. When a young person does experience homelessness, the review will improve access to suitable short term, and longer-term accommodation and specialist floating support and resettlement services.</p>	<p>We have decent quality data from the MAS Gateway (single point of access system for housing related support services) showing the volume of referrals, number of placements and overall demand for housing related support services for young people. Demand is increasing year on year, which is one of the principal reasons why we need to review the pathway for young people. H-CLIC data (national statutory homelessness data) also shows an increasing trend in young people presenting as homeless. We need to review the specialist service for young people to ensure that homelessness prevention opportunities are maximised, and that fewer young people experience homelessness. Data from childrens services highlighting the volume of 16/17 year old children and care leavers 18-25 years old who are threatened with homelessness is also monitored and reviewed regularly.</p>	<p>The impact of the review is expected to be positive. We aim to ensure that fewer young people experience homelessness by intervening at the right time to provide support and advice and prevent homelessness. We also expect that access to short term supported accommodation and longer-term accommodation and specialist support is improved for young people in Manchester.</p>

<p><b>Disability</b></p>	<p>Work to embed an equalities approach across commissioning will ensure that the needs of disabled people are proactively considered as part of commissioning decisions. This will include ensuring the availability of adapted supported accommodation as part of any new schemes.</p>		<p>Monitoring of positive impacts will form part of contract monitoring, including health and wellbeing outcomes. Co-production with people using services will influence service design and delivery to ensure it meets needs.</p>
<p><b>Race</b></p>	<p>Work to embed an equalities approach across commissioning will ensure that the needs of disabled people are proactively considered as part of commissioning decisions, and that all services are culturally sensitive.</p>		<p>Monitoring of positive impacts will form part of contract monitoring, including health and wellbeing outcomes. Co-production with people using services will influence service design and delivery to ensure it meets needs.</p>
<p><b>Sex</b></p>	<p>The development of a designated Women's Pathway aims to tackle the inequalities faced by women who have traditionally accessed services designed to meet the needs of men, often in mixed sex services that don't sometimes have the necessary expertise</p>	<p>There is a strong evidence base that women experience homelessness, and in particular rough sleeping, differently to men and that the services provided to them need to be specifically tailored to meet their differing needs. This ranges from initial access to services as women are often 'hidden to homelessness',</p>	<p>Monitoring of positive impacts will form part of contract monitoring, including health and wellbeing outcomes. Co-production with people using services will influence service design and delivery to ensure it meets needs.</p>

	<p>to support women who have been victims of violence or abuse. A designated accommodation and support pathway will ensure that support is delivered in a sensitive, trauma-informed way in spaces that women feel safe in, providing a positive impact for this group.</p>	<p>through to the different support needs that women may have given the prevalence of violence and/or abuse experienced by this group <a href="https://www.mungos.org/news/women-and-rough-sleeping-report-released/">https://www.mungos.org/news/women-and-rough-sleeping-report-released/</a>,</p> <p>In addition, co-production through the Manchester Homelessness Partnerships 'Women's Homelessness Inclusion Group' initially identified the need for this pathway through extensive consultation and collaboration with women accessing homelessness services over a number of years, will continue to co-produce the pathway as the project develops. <a href="https://mhp.org.uk/action-groups/womens-homelessness-inclusion/">https://mhp.org.uk/action-groups/womens-homelessness-inclusion/</a></p>	
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<p><b>Sexual Orientation</b></p>	<p>The provision of an LGBTQ+ accommodation aims to meet the specific accommodation and support needs of this group which may differ from cisgender heterosexual service users. The accommodation provision aims to reduce any discrimination or harassment this group may experience when accessing homelessness assistance or temporary accommodation. Staff at the provision are extensively trained to ensure they are able to address any support issues experienced by this group sensitively, successfully and without prejudice. Providing accommodation that is self-contained also provides the security and privacy needed to have a positive impact on this group.</p>	<p>The service has been running for around two years and referrals into the accommodation outnumbers the bedspaces, showing there is a clear demand for specialised accommodation for this group.</p> <p>Research conducted by AKT shows that 59% of young LGBTQ+ people have faced some form of harassment or discrimination when accessing services. <a href="https://akt.org.uk">Download.ashx (akt.org.uk)</a>. This highlights the need for well informed and specialised service to reduce the potential discrimination and harassment faced by this group.</p>	<p>The impact on this group and the success of the provision will be captured through regular monitoring and reports which will look at engagement with services and move on outcomes. This will reflect any improvements to health and wellbeing whilst in the service.</p>
<p><b>Marriage / civil partnership</b></p>	<p>Work to embed an equalities approach across commissioning will ensure that the needs of people who are married or civil partnered are proactively considered as part of commissioning decisions. This will include</p>		<p>Monitoring of positive impacts will form part of contract monitoring, including health and wellbeing outcomes. Co-production with people using services will influence service design and delivery to ensure it meets needs.</p>

	ensuring sufficient accommodation options for couples wishing to reside together.		
<b>Pregnancy / maternity</b>	Work to embed an equalities approach across commissioning will ensure that the needs of pregnant people are proactively considered as part of commissioning decisions.		Monitoring of positive impacts will form part of contract monitoring, including health and wellbeing outcomes. Co-production with people using services will influence service design and delivery to ensure it meets needs.
<b>Gender Reassignment</b>	The Transgender Inclusion Policy sets out how Manchester City Council aims to ensure the equal and fair treatment of Transgender people accessing accommodation and support services. We recognise that Transgender people have specific support needs and may experience specific forms of discrimination and	<a href="https://endhomelessness.org/wp-content/uploads/2020/07/Trans-Homelessness-Brief-July-2020.pdf">https://endhomelessness.org/wp-content/uploads/2020/07/Trans-Homelessness-Brief-July-2020.pdf</a>  Evidence has been retrieved from specialised services and research conducted by these services, which shows that transgender people do experience homelessness differently.  Partnership meetings are being conducted with specialist services such as the LGBT Foundation and the	Monitoring of positive impacts will form part of service monitoring, including equalities monitoring.

	<p>harassment whilst homeless or accessing support.</p> <p>This policy will outline our commitment to the Transgender community, from the training of staff through to the challenging of institutional discrimination. However, it will also outline exemptions contained within the Equality Act 2010. These exemptions allow for the exclusion of Transgender people from same sex services and accommodation, in certain circumstances. In certain circumstances, we may invoke these exemptions however, this is not a rule and our decision making will be evidence based and outlined within our policy and procedures.</p>	<p>Equality and Diversity team to ensure work is evidence based and informed by the lived experiences of Transgender people.</p>	
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<p><b>Faith / religion / belief</b></p>	<p>Work to embed an equalities approach across commissioning will ensure that different religions and faiths proactively considered as part of commissioning decisions, including ensuring that all services are culturally sensitive.</p>		<p>Monitoring of positive impacts will form part of contract monitoring, including health and wellbeing outcomes. Co-production with people using services will influence service design and delivery to ensure it meets needs.</p>
<p><b>Additional / Optional Characteristics</b></p>			
<p><b>People living in Poverty</b></p>	<p>Work to embed an equalities approach across commissioning will ensure that the needs of people living in poverty are proactively considered as part of commissioning decisions. An approach to building skills and supporting people into work already underpins services but this will be expanded through further initiatives and commissioning work.</p>		<p>Monitoring of positive impacts will form part of contract monitoring, including health and wellbeing outcomes. Co-production with people using services will influence service design and delivery to ensure it meets needs.</p>

**Carers**

Work to embed an equalities approach across commissioning will ensure that the needs of people with caring responsibilities are proactively considered as part of commissioning decisions.

Monitoring of positive impacts will form part of contract monitoring, including health and wellbeing outcomes. Co-production with people using services will influence service design and delivery to ensure it meets needs.

<p><b>Homelessness</b></p>	<p>As part of the homelessness transformation plans, the service will develop new temporary accommodation provision that will be used as an alternative to Bed and Breakfast (B&amp;B) accommodation. This will help to reduce, and then eradicate the routine use of B&amp;B accommodation. The new provision will provide good quality temporary accommodation with support for people who are experiencing homelessness, and who have been assessed as being more vulnerable than an “ordinary person”. The new provision will help to meet the needs of vulnerable people from disadvantaged groups who are experiencing homelessness and will help to minimise the disadvantages they face due to being vulnerable.</p>	<p>Temporary accommodation data held by the homelessness service, specifically volume of placements in B&amp;B accommodation, length of stay, outcomes and cost.</p>	<p>The impact of developing new temporary accommodation schemes to use as alternative to B&amp;B provision will be positive. It will help to reduce, and then eradicate the use of B&amp;B provision for vulnerable people who are experiencing homelessness. We will move away from a position where vulnerable people are placed in poor quality accommodation without support, to one where vulnerable people will be placed in high-quality short-term accommodation with the provision of support on site. Outcomes for people who are experiencing homelessness will improve.</p>
<p><b>Ex-Armed Forces</b></p>	<p>Work to embed an equalities approach across commissioning will ensure that the needs of ex-armed forces veterans are proactively considered as part of commissioning decisions.</p>		<p>Monitoring of positive impacts will form part of contract monitoring, including health and wellbeing outcomes. Co-production with people using services will influence service design and delivery to ensure it meets needs.</p>

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**QUESTION 1 TIP:** think about 1) whether your policy, strategy, project or service redesign removes or minimises disadvantage for this group, 2) whether it meets their needs that are different from other people's and / or 3) whether it promotes diversity / encourages participation.

**QUESTION 2 TIP:** evidence could include customer profile data, demographic information, research, or engagement and consultation outcomes

**QUESTION 3 TIP:** think about the extent to which your policy, strategy, project or service redesign meets our equality duties and whether this should or could be improved. If you identify any actions to address impacts, list these in Annex 1 along with responsible officers and timescales for each action.

#### 4. Quality Assurance - Equality, Diversity and Inclusion Team

Send your draft EqIA to the EDI Team inbox - [equalitiesteam@manchester.gov.uk](mailto:equalitiesteam@manchester.gov.uk) using **EqIA Advice – Your Service Name.** in the subject line.

<b>EDI Team: Name</b>		<b>Date reviewed:</b>	
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#### 5. Head of Service Approval

Your completed analysis needs to be signed off by your Head of Service.

<b>Name:</b>		<b>Date:</b>	
<b>Job title:</b>		<b>Signature:</b>	

## Annex 1 – Actions Log

Use this table to list the actions you have identified to mitigate and adverse risks, detailing who will be responsible for completing these and setting clear timescales for delivery. Your actions will be reviewed at 6 months and 12 months to assess progress.

Actions identified in your EqIA	Responsible officer / team for delivery	Timescale for delivery	Comments
Develop and embed an commissioning approach centred around tackling inequalities and measuring the impact of this work	Anna Thorogood	12 months – September 2023	
Develop and monitor outcomes to assess the positive impact of the Women's Pathway	Anna Thorogood	Ongoing	
Review the Young Persons Pathway	Sean Bleasdale	6 months – April 2023	
Develop a range of new accommodation schemes that can provide accommodation and support for both males and females. These will include some mixed provision,	Sean Bleasdale	12 months – September 2023	

as well as single sex provision (both male and female)			
Develop a Transgender Inclusion Policy			
Provision of LGBTQ+ Accommodation			